

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JEOVANNY GARCIA, MELVIN IVAN CHAVEZ,
and NICEFORO MARTIN BAUTISTA, on behalf of
themselves and others similarly situated,

Plaintiffs,

-against-

AKR CORPORATION dba PALACE FRIED
CHICKEN, NASRULLAH KAMRAN, GHULEM
MOHAMMAD, MOHAMMAD D. ARIFEE, and
WYCKOFF FOOD CORP. dba PALACE FRIED
CHICKEN,

Defendants.

Case No.: 11cv6184
(RRM)(RLM)

**NOTICE OF
MOTION FOR
DEFAULT
JUDGMENT**

TO ALL PARTIES AND TO
THEIR ATTORNEYS OF RECORD:

TAKE NOTICE THAT, plaintiffs Jeovanny Garcia, Melvin Ivan Chavez, and Niceforo Martin Bautista, by and through their attorneys, Cilenti & Cooper, PLLC, will move for a default judgment pursuant to Fed. R. Civ. P. 55(b)(2) against defendants Ghulem Mohammad and Wyckoff Food Corp., or any other business entity doing business as "Palace Fried Chicken", located at 285 Wyckoff Avenue, Brooklyn, New York, as more particularly set out in the accompanying motion and declaration of Peter H. Cooper, Esq., dated July 6, 2012, and the exhibits attached thereto, before the Honorable Roanne L. Mann, U.S.M.J., as referred by the order of the Honorable Judge Roslynn R. Mauskopf on June 25, 2012, at the Courthouse for the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, on a date and time fixed by the Court.

Dated: New York, New York
July 6, 2012

Respectfully submitted,

By: 

Peter H. Cooper (PHC 4714)
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To: Ghulem Mohammad
Defendant in Default
285 Wyckoff Avenue
Brooklyn, New York 11237

Wyckoff Food Corp. dba Palace Fried Chicken
Defendant in Default
285 Wyckoff Avenue
Brooklyn, New York 11237

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